

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DAVID RICE and ELIZABETH RICE,
individually and as a marital community,
and SETH DONAHUE,

Plaintiffs,

v.

CITY OF ROY, a Washington
municipality, and CHRIS JOHNSON,
individually,

Defendants.

CASE NO. 3:20-cv-05223 RJB

VERDICT FORM

Original

We, the jury, unanimously find as follows:

1. On Plaintiff David Rice's excessive force claim, we find for

Plaintiff

(Write in "Plaintiff" or "Defendant Chris Johnson")

2. On Plaintiff Seth Donahue's excessive force claim, we find for

Plaintiff

(Write in "Plaintiff" or "Defendant Chris Johnson")

Answer Question 3 only if you found for a plaintiff on Questions 1 and/or 2.

3. On Plaintiffs' ratification claim against the City of Roy, we find for

Plaintiff

(Write in "Plaintiffs" or "Defendant City of Roy")

- 1 4. On Plaintiff David Rice's negligence claim we find for

2 Defendant Chris Johnson

3 (Write in "Plaintiff" or "Defendant Chris Johnson")

- 4 5. On Plaintiff Seth Donahue's negligence claim, we find for

5 Defendant Chris Johnson

6 (Write in "Plaintiff" or "Defendant Chris Johnson")

7 **Complete Questions 6 and 7 only if you found for Plaintiff on Question 4 and/or 5.**

- 8 6. On Defendants' claim of contributory negligence against Plaintiff David Rice, we
9 find for

10 (Write in "Plaintiff" or "Defendant Chris Johnson")

- 11 7. On Defendants' claim of contributory negligence against Plaintiff Seth Donahue,
12 we find for

13 (Write in "Plaintiff" or "Defendant Chris Johnson")

14 **Complete Questions 8 and 9 only if you found for the named plaintiff on**
15 **Questions 1 and/or 2 and/or 4 and/or 5.**

- 16 8. We find that Plaintiff David Rice's total damages, not including punitive
17 damages, if any, caused by the excessive force and/or negligence of Defendant
18 Chris Johnson are

19 \$ 2,208,000

- 20 9. We find that Plaintiff Seth Donahue's total damages, not including punitive
21 damages, if any, caused by the excessive force and/or negligence of Defendant
22 Chris Johnson are

23 \$ 1,049,000

1 **Complete Questions 10 and 11 only if you found for the named plaintiff on**
2 **Questions 1 & 2..**

3 10. We find that Plaintiff David Rice IS Not
4 (write in "is" or "is not")

5 awarded punitive damages, and fix the amount, if any, at

6 \$ zero
7 (write in an amount or "zero")

8 11. We find that Plaintiff Seth Donahue IS Not
9 (write in "is" or "is not")

10 awarded punitive damages, and fix the amount, if any, at

11 \$ zero
12 (write in an amount or "zero")

13 12. On Plaintiff Elizabeth Rice's consortium claim, we find her total consortium
14 damages to be

15 \$ zero

16 **Complete Questions 13 and 14 only if you found for Defendant Chris Johnson on**
17 **Questions 6 and/or 7.**

18 13. Assume that 100% represents the total combined negligence that proximately
19 caused Plaintiff David Rice's damages. What percentage of the parties'
20 negligence is attributable to Mr. Rice?

21 _____ %

22 14. Assume that 100% represents the total combined negligence that proximately
23 caused Plaintiff Seth Donahue's damages. What percentage of the parties'
24 negligence is attributable to Mr. Donahue?

_____ %

1 Dated this 23 day of September, 2021.



4 Presiding Juror

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